



August 22, 2019

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: Establishing the Digital Opportunity Data Collection WC Docket No. 19-195  
Modernizing the FCC Form 477 Data Program, WC Docket No. 11-10  
Connect America Fund, WC Docket No. 10-90  
Rural Digital Opportunities Fund, WC 19-126**

Dear Ms. Dortch:

On August 20, 2019, representatives of USTelecom, ITTA, WISPA and CostQuest Associates met separately with Preston Wise, Special Counsel to Chairman Pai; Commissioner Michael O’Rielly and Joel Miller, Chief of Staff to Commissioner O’Rielly; Joe Calascione, Acting Legal Advisor to Commissioner Carr; Bill Davenport, Chief of Staff to Commissioner Starks and Alisa Valentin, Special Advisor to Commissioner Starks; and, Kris Montieth, Chief of the Wireline Competition Bureau, Kirk Burgee and Chelsea Fallon, of the Wireline Competition Bureau, and Steve Rosenberg, Ken Lynch and Ying Ke of the Office of Economic Analysis. A full list of industry participants is below. The purpose of the meetings was for the Broadband Mapping Consortium (Consortium) members to present the Broadband Mapping Initiative Proof of Concept, Summary of Findings Report (Report).<sup>1</sup>

Jim Stegeman, President and CEO of CostQuest Associates, explained the methodology behind the Consortium’s Broadband Serviceable Location Fabric (Fabric) pilot project in Missouri and Virginia (Pilot) and highlighted its key findings. The first of those findings is that the Fabric is able to reveal unserved locations in census blocks that are currently designated as “served” using the “one served - all served” census block methodology. Our Pilot identified 445,000 locations (38% of the census block total locations) that are not served by our Consortium participants but are counted as served today. We note in the report that although the Pilot was open to all providers not every broadband provider chose to participate in this Pilot, so the actual number is likely to be lower. Mr. Stegeman indicated in the meetings that in an effort

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<sup>1</sup> See Letter from Jonathan Spalter, President & CEO, USTelecom – The Broadband Association, Genevieve Morelli, President, ITTA, Claude Aiken, President and CEO, WISPA to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 11-10, 10-90 (Mar. 21, 2019); Letter from B. Lynn Follansbee, VP – Policy & Advocacy, USTelecom to Marlene H. Dortch, Secretary, FCC, WC Docket Nos. 19-195, 11-10, 10-90, 19-126 and accompanying “Broadband Mapping Initiative Proof of Concept Summary of Findings Report” (Aug. 20, 2019).

to find a lower bound for this number, when CostQuest looked at the census blocks that non-participating providers reported as served on FCC Form 477 and considered all locations within those census blocks as completely served, the number of unserved locations within served census blocks dropped to about 200,000 locations in both states combined. Mr. Stegeman also noted that, as compared to rural locations found in the Fabric, currently used estimates of census locations counts are incorrect 48% of the time and that those inconsistencies are both over and under inclusive.

Another important finding discussed is the differences in distances between rural Fabric locations in Missouri and Virginia as compared to those locations in the Pilot that were geocoded using commercial geocoders. As shown in the report, 61% of the Pilot participant provided geocoded locations were 7.6 meters/25 feet away<sup>2</sup> from where they appear in the Fabric and 25% percent of those locations are over 100 meters away. Mr. Stegeman indicated that when a location is off by over 100 meters, it can lead to placing the location in the wrong census block, which it found occurred 23% of the time. Misidentifying the census block is a problem for purposes of decision making about government funding of those rural locations and could lead to subsidized overbuilding of served areas.

The parties also reviewed pages 9-12 of the Report which demonstrate how the Fabric allows a much more targeted view of served and unserved locations as opposed to the “one served - all served” methodology and is a necessary element of polygon reporting. Page 9 shows how ten census blocks in Central Eastern Missouri look using the “one served-all served” methodology. Page 10 shows what a potential polygon filing would look like on top of these census blocks. The polygons shown are based on the Pilot participant’s commercially geocoded locations used to create polygons running along roads with a 150 foot buffer. Mr. Stegeman noted that this is not the only way to create a polygon, but it is just an example of how a polygon could be created using currently available geocoding methods. The parties acknowledged that it is part of the Commission’s Further Notice<sup>3</sup> to determine how polygons should be created.

Slide 11 shows that good data is required for accurate polygons. Comparing the same polygons with the Fabric locations associated with the addresses used to create the polygons demonstrates how polygons based on poor geocoded information will misrepresent the broadband service area. Slide 12 presents the big coverage reveal: how the Fabric process allows us to see not only the served locations but also the *underserved* locations in the census blocks. Based on this sample, it is clear that most of the unserved locations are in the eastern half of these ten census blocks – locations that may not have been seen by providers. The clusters of unserved locations help to show where service is needed and helps with specificity in planning networks.

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<sup>2</sup> 7.6 meters is the distance used by USAC to determine whether a CAF location in the HUBB is accurate.

<sup>3</sup> *Digital Opportunity Data Collection*, Report and Order and Further Notice of Proposed Rulemaking, WC Docket Nos. 19-195, 11-10 (Aug. 2, 2019).

Mr. Stegeman also provided to the attendees some lessons learned in undertaking the creation of the Fabric in the two states. The primary request of the Commission is to clarify the definition of a “location,” including the requirements for the assignment of structures into residential and business categories. With respect to budget and timing, Mr. Stegeman confirmed the estimated cost of the Pilot using some proprietary data and all open source data. Mr. Stegeman pointed out that the proprietary Fabric creates a superior product at a lower estimated cost (\$8.5-\$11 million) and would allow for public viewing but would be somewhat restricted in that it would not be available for download in its entirety by the public. The estimated cost of the completely open source data Fabric would be twice the cost in part because it would rely on the visual verification of more records in order to get to the same level of accuracy.

With respect to the visual verification of records in creating the Fabric, Mr. Stegeman reported that its use is a key driver of the quality of the Fabric and was a very useful process in the situations where the land use data was not normalized and/or it was unclear which structure on a parcel was the serviceable structure. Bureau staff asked to see the decision tree that was used to assist the participants in the managed crowd that performed the visual verifications. Per their request we have attached that decision tree to this filing.

Additionally, the parties discussed how the Fabric data compared to currently filed HUBB data and talked through in more detail the back up data for each state that is reflected in the key findings.

Please contact the undersigned should you have any questions.

Respectfully submitted,

USTELECOM



By: \_\_\_\_\_

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Vice President –Policy & Advocacy

cc: Nick Degani  
Preston Wise  
Commissioner Michael O’Rielly  
Joel Miller  
Arielle Roth  
Joe Calascione  
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Kris Montieth  
Steve Rosenberg  
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**Industry Attendees**

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Mike Saperstein, USTelecom  
Allison Remsen, USTelecom  
Genny Morelli, ITTA  
Steve Coran, WISPA  
Louis Peraertz, WISPA  
Jim Stegeman, CostQuest  
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